

Brussels, 20 October 2026

Subject: Automotive omnibus Euro 7 HDV brake emissions – A five-year postponement is essential to protect safety, industrial competitiveness and regulatory credibility

Dear Member of the European Parliament,

Key elements of the Euro 7 implementation framework for heavy-duty vehicles remain under development. The implementing acts, including critical provisions on test procedures and the methodology for translating component-level measurements into vehicle-level compliance requirements, have not yet been finalised and sufficiently validated. This continues to create uncertainty for vehicle development, type-approval and implementation planning.

Without urgent action and a realistic implementation timeline, manufacturers risk being required to comply with regulatory obligations before the necessary testing methodologies and compliance procedures have been fully developed, validated and proven fit for purpose. This could undermine regulatory certainty and have broader implications for vehicle development, safety validation, production planning, investment decisions and the competitiveness of Europe's heavy-duty vehicles industry.

ACEA therefore calls for a five-year postponement of the Euro 7 HDV brake-emissions requirements, as an essential minimum safeguard **of current EURO 7 application dates for HDVs**. This is necessary to ensure that the regulatory framework is technically sound, practical and fit for purpose.

The development of a dedicated heavy-duty brake cycle under the UNECE PMP programme has been delayed, leaving insufficient time to validate the methodology across the wide range of HDVs on the market and ensure reliable, reproducible regulatory results.

This is not a minor technical detail that can be resolved through accelerated implementation. Heavy-duty vehicles encompass a wide variety of vehicle categories, configurations, operating conditions and brake systems. Their braking systems are safety-critical, and their development and validation require extensive testing. Rushing this process to meet the current deadline would be inconsistent with the very high safety standards expected of European manufacturers.

The additional time would allow the necessary work to be completed in a clear and structured sequence:

- **Finalise and validate the test procedure** for heavy-duty brake components under the UNECE GRPE PMP mandate, in accordance with applicable regulatory provisions.
- **Establish reliable vehicle-level requirements** by translating component-test results into representative and technically robust vehicle-level results.
- **Validate the methodology across relevant vehicle categories**, allowing manufacturers and regulators to build the necessary evidence base and assess environmental impacts.
- **Finalise proportionate regulatory limits and implementation arrangements**, giving manufacturers and suppliers sufficient time to develop, validate and industrialise compliant solutions.

This approach would provide the time needed to establish a robust technical foundation and clear, workable legislation, while preserving the environmental objectives of Euro 7.

A premature implementation would risk imposing requirements before the underlying methodology and technical procedures are sufficiently established, creating unnecessary complexity, costs and uncertainty for manufacturers and suppliers. Investment and product development decisions would have to be made against a moving technical baseline, while critical testing and validation procedures remain incomplete. This creates a real risk of avoidable development costs, disrupted production cycles, constrained industrial planning and unnecessary pressure on the European supply chain.

A five-year postponement of the Euro 7 HDV brake-emissions and a two-year postponement of current Euro 7 application dates for HDVs would provide the regulatory certainty needed to plan investments responsibly, protect industrial capacity and ensure that suppliers of all sizes have a realistic opportunity to adapt.

Yours sincerely,

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